

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

ORIGIN

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UNITED STATES OF AMERICA :
- v. - : INFORMATION
MICHAEL WOLF, : S1 11 Cr. 656 (KMK)
Defendant. :
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COUNT ONE

The United States Attorney charges:

1. From in or about July 2010 through in or about December 2010, in the Southern District of New York and elsewhere, MICHAEL WOLF, the defendant, and others known and unknown, unlawfully and knowingly did combine, conspire, confederate, and agree together and with each other to commit robbery, as that term is defined in Title 18, United States Code, Section 1951(b)(1), and would and did thereby obstruct, delay, and affect commerce and the movement of articles and commodities in commerce, as that term is defined in Title 18, United States Code, Section 1951(b)(3), to wit, WOLF, and others known and unknown, agreed to commit armed robberies of individuals involved in commercial activities that affected interstate commerce.

(Title 18, United States Code, Section 1951.)

COUNT TWO

The United States Attorney further charges:

2. On or about September 26, 2010, in the Southern

District of New York and elsewhere, MICHAEL WOLF, the defendant, unlawfully and knowingly did commit robbery, as that term is defined in Title 18, United States Code, Section 1951(b)(1), and did thereby obstruct, delay, and affect commerce and the movement of articles and commodities in commerce, as that term is defined in Title 18, United States Code, Section 1951(b)(3), to wit, WOLF and two co-conspirators not named as defendants herein stole money and other items from an individual in the vicinity of Horton Avenue, Lynbrook, New York.

(Title 18, United States Code, Sections 1951 and 2.)

COUNT THREE

The United States Attorney further charges:

3. On or about September 26, 2010, in the Southern District of New York and elsewhere, MICHAEL WOLF, the defendant, during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, namely, the robbery charged in Count Two of this Information, knowingly did use and carry firearms, and in furtherance of such crime, did possess firearms, and did aid and abet the use, carrying, and possession of firearms, one of which was brandished during the robbery.

(Title 18, United States Code, Sections 924(c)(1)(A)(ii) and 2.)

COUNT FOUR

The United States Attorney further charges:

4. On or about October 28, 2010, in the Southern District of New York, MICHAEL WOLF, the defendant, unlawfully and

knowingly did commit robbery, as that term is defined in Title 18, United States Code, Section 1951(b)(1), and did thereby obstruct, delay, and affect commerce and the movement of articles and commodities in commerce, as that term is defined in Title 18, United States Code, Section 1951(b)(3), to wit, WOLF and two co-conspirators not named as defendants herein stole individuals' cellular phones and the proceeds of a card game at a men's club in the vicinity of Lake Street, Poughkeepsie, New York, during which robbery one of the co-conspirators discharged a gun and assaulted an individual.

(Title 18, United States Code, Sections 1951 and 2.)

COUNT FIVE

The United States Attorney further charges:

5. On or about October 28, 2010, in the Southern District of New York, MICHAEL WOLF, the defendant, during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, namely, the robbery charged in Count Four of this Information, knowingly did use and carry firearms, and in furtherance of such crime, did possess firearms, and did aid and abet the use, carrying, and possession of firearms, one of which was discharged during the robbery.

(Title 18, United States Code, Sections 924(c)(1)(A)(iii), 924(c)(1)(C)(i), and 2.)

FORFEITURE ALLEGATION AS TO COUNTS ONE, TWO, and FOUR

6. As a result of committing one or more of the offenses, in violation of Title 18, United States Code, Sections

1951 and 2, alleged in Counts One, Two, and Four of this Information, MICHAEL WOLF, the defendant, shall forfeit to the United States, pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461, all property, real and personal, that constitutes or is derived from proceeds traceable to the commission of the offenses, including but not limited to a sum in United States currency representing the amount of proceeds obtained as a result of the offenses.

Substitute Assets Provision

7. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- (1) cannot be located upon the exercise of due diligence;
- (2) has been transferred or sold to, or deposited with, a third person;
- (3) has been placed beyond the jurisdiction of the Court;
- (4) has been substantially diminished in value; or
- (5) has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to 21 U.S.C.

§ 853(p), to seek forfeiture of any other property of said defendant up to the value of the forfeitable property.

(Title 18, United States Code, Section 981,
Title 28, United States Code, Section 2461,
Title 18, United States Code, Sections 1951 and 2, and
Title 21, United States Code, Section 853.)


Preet Bharara
PREET BHARARA
United States Attorney

